

SHEPPARD MULLIN RICHTER & HAMPTON LLP
A Limited Liability Partnership
Including Professional Corporations
GARY L. HALLING, Cal. Bar No. 66087
JAMES L. MCGINNIS, Cal. Bar No. 95788
MICHAEL W. SCARBOROUGH, Cal. Bar No. 203524
Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4106
Telephone: 415-434-9100
Facsimile: 415-434-3947
E-mail: ghalling@sheppardmullin.com
jmcginnis@sheppardmullin.com
mscarborough@sheppardmullin.com

HELEN C. ECKERT, Cal. Bar No. 240531
333 South Hope Street, 43rd Floor
Los Angeles, California 90071-1448
Telephone: 213-620-1780
Facsimile: 213-620-1398
E-mail: heckert@sheppardmullin.com

Attorneys for Defendants
SAMSUNG SDI CO., LTD.,
SAMSUNG SDI AMERICA, INC.,
SAMSUNG SDI (MALAYSIA) SDN. BHD.,
SAMSUNG SDI MEXICO S.A. DE C.V.,
SAMSUNG SDI BRASIL LTDA.,
SHENZHEN SAMSUNG SDI CO., LTD. and
TIANJIN SAMSUNG SDI CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,
et al.*, No. 11-cv-05502;

*CompuCom Systems, Inc. v. Hitachi, Ltd., et
al.*, No. 11-cv-06396;

*Costco Wholesale Corporation v. Hitachi,
Ltd., et al.*, No. 11-cv-06397;

(CONTINUED ON NEXT PAGE)

**DECLARATION OF JAMES L.
MCGINNIS IN SUPPORT OF SDI
DEFENDANTS' MOTION TO EXCLUDE
EXPERT TESTIMONY OF DR. STEPHAN
HAGGARD**

1 *Dell Inc. and Dell Products L.P., v. Hitachi,*
2 *Ltd., et al*, No. 13-cv-02171;

3 *Electrograph Systems, Inc. and Electrograph*
4 *Technologies Corp., v. Hitachi, Ltd., et al.,*
5 *No. 11-cv-01656;*

6 *Interbond Corporation of America v. Hitachi,*
7 *Ltd., et al., No. 11-cv-06275;*

8 *Office Depot, Inc. v. Hitachi Ltd., et al., No.*
9 *11-cv-06276;*

10 *P.C. Richard & Son Long Island Corp., Marta*
11 *Coooperative of Am., Inc., ABC Appliance,*
12 *Inc. v. Hitachi, Ltd., et al., No. 12-cv-02648;*

13 *Schultze Agency Services, LLC, on behalf of*
14 *Tweeter Opco, LLC and Tweeter Newco, LLC*
15 *v. Hitachi, Ltd., et al., No. 12-cv-02649;*

16 *Sears, Roebuck and Co. and Kmart Corp. v.*
17 *Chunghwa Picture Tubes, Ltd., et al., No. 11-*
18 *cv-05514;*

19 *Target Corp. v. Chunghwa Picture Tubes,*
20 *Ltd., et al., No. 11-cv-05514;*

21 *Tech Data Corp and Tech Data Product*
22 *Management, Inc., v. Hitachi, Ltd., et al., No.*
23 *13-cv-00157;*

24 *ViewSonic Corp. v. Chunghwa Picture Tubes,*
25 *Ltd., et al., No. 14-02510..*

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REDACTED VERSION OF DOCUMENT FILED UNDER SEAL

1 I, James L. McGinnis, declare as follows:

2 1. I am a partner at the law firm of Sheppard Mullin Richter & Hampton LLP, counsel
3 of record for defendants Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.;
4 Samsung SDI (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil
5 Ltda.; Shenzhen Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI").
6 I submit this declaration in support of the SDI Defendants' Motion to Exclude Expert Testimony
7 of Dr. Stephan Haggard. I have personal knowledge of the facts set forth herein and, if called as a
8 witness, I could and would competently testify thereto.

9 2. Attached hereto as Exhibit 1 is a true and correct copy of the April 15, 2014 expert
10 report of Dr. Stephan Haggard, the direct-action plaintiffs' expert witness.

11 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the
12 transcript of the July 10, 2014 deposition of Dr. Stephan Haggard.

13
14 I declare under penalty of perjury under the laws of the United States of America
15 that the foregoing is true and correct.

16 Executed this 5th day of December 2014 in San Francisco, California.

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18 /s/ James L. McGinnis

19 James L. McGinnis
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EXHIBIT 1

[SUBMITTED UNDER SEAL]

EXHIBIT 2

[SUBMITTED UNDER SEAL]